

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

GUI GLOBAL PRODUCTS, LTD. d/b/a	§	
GWEE,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	4:20-cv-02624-AHB
SAMSUNG ELECTRONICS CO., LTD.,	§	
AND SAMSUNG ELECTRONICS	§	
AMERICA, INC.,	§	
	§	
Defendants.	§	
	§	

**DECLARATION OF SEAN BORNHEIMER IN SUPPORT OF DEFENDANTS'  
MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)**

I, Sean Bornheimer, declare and state as follows:

1. I am over 18 years of age and competent to make this declaration. If called as a witness, I could and would testify competently to the information contained herein.
2. I am the Senior Director of Product and Experience at Samsung's Design Innovation Center in San Francisco, California ("SDIC"), and I have worked in consumer electronics design related roles at SDIC, formerly known as Samsung Design America, since September 2014. I work out of SDIC's office at 735 Battery Street, San Francisco, California or out of my home in San Francisco, California.
3. In my design roles at SDIC, I was part of the team that conceptualized and designed the product that became the Galaxy Buds for Samsung. We worked on the look and feel of the device, as well as critical functional aspects. In particular, my role was to lead a team of designers responsible for: conducting user and market research to understand and prioritize

the product needs, create and conceptualize novel solutions to those needs, design and build tangible models and materials to validate the solutions, and present and communicate to key executives and decisions makers on the design and direction of the product.

4. The Galaxy Buds design team maintains at SDIC offices design documents, presentations, and materials related to the work we did to create Galaxy Buds. We also maintain information related to predecessor products that were in the development line of the Galaxy Buds, including other wireless earphone systems. To my understanding, nearly all, if not all, of the technical documents and source code relating to the design and development of the Galaxy Buds resides either with the SDIC design team in San Francisco, California or the product development team resident in Korea.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 9, 2020 in San Francisco, California.



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Sean Bornheimer